

EXHIBIT N

STATE OF NEW YORK
SUPREME COURT ALBANY COUNTY

In the Matter of the
Special Proceeding Application of

Index No.: 900899-22

VW CREDIT, INC.,

**NOTICE OF MOTION
FOR SANCTIONS**

Petitioner/Plaintiff,

-against-

BOSCAINO COLLISION & TOWING CORP.,
and THE NEW YORK STATE DEPARTMENT
OF MOTOR VEHICLES,

Respondent(s)/Defendant(s).

Judge Assigned:
Hon. Richard M. Platkin

PLEASE TAKE NOTICE that upon the annexed affirmation of Rudolph J. Meola, dated September 25, 2023, together with the exhibit attached thereto, the undersigned will move this Court on October 13, 2023 at 10:30 o'clock in the forenoon, or as soon thereafter as counsel can be heard for an order pursuant to 22 NYCRR 130-1.1 (c) (1) (2) and (3) assessing sanctions against Boscaino Collision & Towing Corp., Rosen Law LLC and Gary Rosen, Esq. for engaging in frivolous conduct, attempting to influence this litigation by frivolous assertions, threats and intimidation, and;

PLEASE TAKE FURTHER NOTICE that any opposition hereto must be served at least seven (7) days prior to the return date hereof.

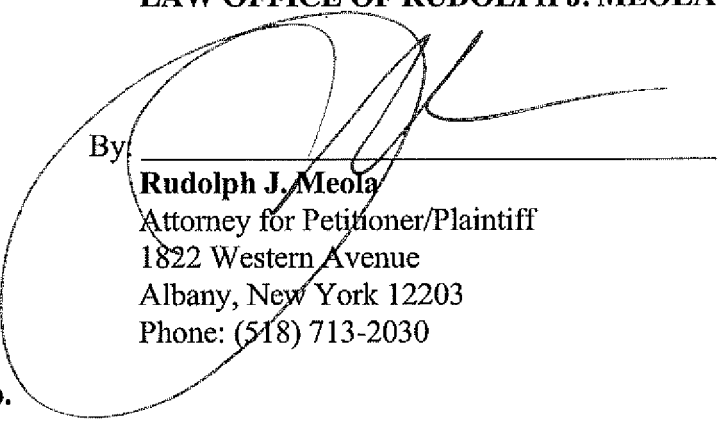
Dated: Albany, New York
September 25, 2023

LAW OFFICE OF RUDOLPH J. MEOLA

TO:

Gary Rosen, Esq.
ROSEN LAW, LLC
Attorney for Respondent
Boscaino Collision & Towing Corp.
216 Lakeville Road
Great Neck, NY 11020

By


Rudolph J. Meola
Attorney for Petitioner/Plaintiff
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Albany, New York 12203
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